

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)

Plaintiff,)

vs.)

ANDRES JIMENEZ-SANTIAGO)

Defendant.)

CASE NUMBER: 25-mj-8081-GCS

CRIMINAL COMPLAINT

I, Joseph R. Hentz, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

COUNT 1

ILLEGAL REENTRY AFTER DEPORTATION

On or about the 26th day of February 2025, in St. Clair County, in the Southern District of Illinois,

ANDRES JIMENEZ-SANTIAGO

an alien, was found in the United States after having been removed therefrom on or about April 1, 2019, at or near Laredo, Texas, and not having obtained the express consent of the Secretary of the Department of Homeland Security to reapply for admission to the United States, in violation of Title 8, United States Code, Section 1326(a).

AFFIDAVIT

I further state that I am a Deportation Officer with Immigration & Customs Enforcement ("ICE"), and that I have been so employed since September 13, 2009. My duties as an ICE Deportation Officer include the investigation of any criminal violations of the Immigration and Nationality Act. I have recently investigated the suspected unlawful presence in the United States of an individual named Andres Jimenez-Santiago. According to official records maintained by

ICE, Andres Jimenez-Santiago is a Mexican national who was removed on one prior occasion from the United States to Mexico on April 1, 2019, at Laredo, Texas.

On September 17, 2024, I learned that Jimenez-Santiago reentered the United States after searching St. Clair County, Illinois jail bookings on LexisNexis. These jail bookings are part of the Accurint Virtual Crime Center data base used by ICE Enforcement and Removal Operations (“ERO”) officers. Through this search, I learned that Jimenez-Santiago was arrested on September 16, 2024, by the Belleville, Illinois police department for driving under the influence of alcohol and aggravated battery to police officer. Thereafter, I was able to match Jimenez-Santiago’s booking photos taken after his arrest in St. Clair County, Illinois with his booking photos taken by federal law enforcement officials before his prior removal to Mexico.

On February 26, 2025, at around 0920 hours, I along with special agents from the FBI, DEA, and HSI Fairview Heights, Illinois offices, waited for Jimenez-Santiago to finish his court hearing at the St. Clair County Courthouse in Belleville, Illinois. Jimenez-Santiago was encountered and arrested on the fourth floor of the St. Clair County Courthouse. Jimenez-Santiago was informed he was being placed into custody for the criminal offense of Illegal Reentry After Deportation. The other federal agents and I were able to positively identify Jimenez-Santiago using his previous booking photo from his DUI and aggravated battery arrest from September 16th, 2024. Jimenez-Santiago was transported to the St. Clair County Jail. Jimenez’s fingerprints were taken at the time of booking. Jimenez-Santiago’s fingerprints were confirmed to be that belonging to his immigration A-file record A# 203 459 935 and FBI#MVR23E5KE. Jimenez-Santiago’s arrests in St. Clair County do not appear on his criminal history report due to Jimenez-Santiago being combative at the time of booking for his aggravated battery and DUI arrest on September 16th, 2024.

Jimenez-Santiago is now in the United States Marshals’ custody and housed at the St. Clair County, Illinois Jail, pending federal charges for Illegal Reentry After Deportation. Jimenez-Santiago refused his right to contact the Mexican consulate to inform them of his arrest. According

to official records maintained by ICE, following his removal to Mexico on April 1, 2019, Andres Jimenez-Santiago, never received permission from the Secretary of the Department of Homeland Security to lawfully reenter the United States.

Based on the above information, it appears that Andres Jimenez-Santiago is an alien who was found in the United States after having been previously removed from the United States, all in violation of Title 8, United States Code, Section 1326(a).

FURTHER AFFIANT SAYETH NAUGHT.

JOSEPH R HENTZ

Digitally signed by JOSEPH R
HENTZ
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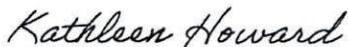
JOSEPH R. HENTZ,
Deportation Officer
Immigration and Customs Enforcement

State of Illinois)
) SS.
County of St. Clair)

Sworn to before me, and subscribed in my presence on the 27th day of February
2025, at East St. Louis, Illinois.



GILBERT C. SISON
United States Magistrate Judge



KATHLEEN M. HOWARD
Assistant United States Attorney